



U.S. Department of Justice

United States Attorney  
Southern District of New York

The Silvio J. Mollo Building  
One Saint Andrew's Plaza  
New York, New York 10007

October 24, 2024

The Honorable Richard M. Berman  
United States District Judge  
Southern District of New York  
Daniel Patrick Moynihan United States Courthouse  
500 Pearl St.  
New York, NY 10007

Re: *United States v. Akinotcho et al.*, 23 Cr. 265 (RMB)

Dear Judge Berman:

The Government respectfully submits this letter to request two adjournments in this case.

First, with the defense's consent, and after conferring with Chambers, the Government asks that the conference for defendant Amadou Tidiane Ba be adjourned from October 31 until November 19 at 9 a.m.

Second, with the defense's consent, the Government asks for an approximately 30-day adjournment of the conference for defendant Mohamed Nabil Elikplim Akinotcho currently scheduled for October 31.

Also with the defense's consent, the Government asks for an exclusion of time as to both defendants under the Speedy Trial Act until the dates of the newly scheduled proceedings. The ends of justice served by taking such action outweigh the best interest of the public and the defendant in a speedy trial (i) as to defendant Ba because it will ensure the presence of the defendant's counsel of choice, who is currently on trial and (ii) as to defendant Akinotcho because it will allow the parties to continue conferring regarding a possible pretrial disposition.

Application granted on consent.

Defendant Amadou Tidiane Ba's (23-cr-265-4) next  
conference is adjourned until November 19, 2024 at 9 AM.

Defendant Mohamed Nabil Elikplim Akinotcho's (23-  
cr-265-5) next conference is adjourned until Dec. 3, 2024 at  
10 AM. Time is excluded for both Defendants under the  
Speedy Trial Act for reasons set forth in the letter request.

SO ORDERED:

Date: 10/25/2024

*Richard M. Berman*  
Richard M. Berman, U.S.D.J.

Respectfully submitted,

AN WILLIAMS  
States Attorney

*Y. Chong*

Y. Chong  
United States Attorney  
63-3172

Todd A. Spodek, Esq.